

1 Michael S. Kogan (SBN 128500)
KOGAN LAW FIRM, APC
2 11500 W. Olympic Blvd., Suite 400
Los Angeles, California 90064
3 Telephone (310) 954.1690
mkogan@koganlawfirm.com

Attorneys for Debtor

**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION**

In re

Case No. 3:23-bkz-10090-SK

LESLIE KLEIN.

Chapter 11

Debtor.

ERICA VAGO and JOSEPH VAGO

**STIPULATION (1) TO EXTEND TIME TO
RESPOND TO COMPLAINT, AND (2) TO
CONTINUE STATUS CONFERENCE**

LESLIE KLEIN.

Present Status Conference Date:

Date: August 9, 2023

Time: **9:00 a.m.**

Requested Status Conference Date:

Date: September 6, 2023

Time: 9:00 a.m.

Place: Courtroom 1575

This Stipulation (1) to Extend Time to Respond to Complaint, and (2) to Continue Status Conference is entered into by Plaintiffs, Erica Vago and Joseph Vago (the "Plaintiff"), and Defendant, Leslie Klein ("Klein" or "Defendant", and together with Plaintiff, the "Parties"), through their respective attorneys, with reference to the following facts:

A. On May 10, 2023, Plaintiffs Erica Vago and Joseph Vago filed the Complaint to

STIPULATION (1) TO EXTEND TIME TO RESPOND TO COMPLAINT, AND (2) TO CONTINUE STATUS CONFERENCE

1 Determine the Nondischargeability of Certain Debts Owed by Debtor Leslie Klein to Erica and
2 Joseph Vago pursuant to 11 U.S.C. § 523 and To Deny Discharge Pursuant to Section 727(a)(12)
3 (“Complaint”) against the Defendant Leslie Klein [Doc #1].

4 B. On May 10, 2023, the Court’s Summons & Notice of Status Conference (“Summons”)
5 [Doc #2] set June 12, 2023 as the Defendant’s deadline to respond to the Complaint, and a status
6 conference on the matter for August 9, 2023 at 9:00 a.m. (the “Status Conference”).

7 C. On June 12, 2023, Klein’s then counsel Eric Olson (“Olson”), who had just been recently
8 on May 23, 2023, substituted in as counsel for Klein (Doc #150) requested a 30-day extension to
9 respond to the Complaint, and represented that the Defendant needed time to retain experienced
10 bankruptcy counsel for the adversary proceeding.

11 D. On June 12, 2023, the parties executed and signed a Stipulation to Extend Time to
12 Respond to the Complaint. [Doc #7]

13 E. On June 13, 2023, the Court signed the Order on Stipulation to Extend Time to Respond to
14 the Complaint, continuing Defendant’s response date to July 12, 2023. [Doc #9].

15 F. In connection with the Complaint, the Plaintiff is satisfied that the Defendant has hired
16 experienced competent bankruptcy counsel (Michael Kogan of the Kogan Law Firm, APC – who
17 has substituted in on July 24, 2023) who is familiar with both the issues in this adversary
18 proceeding, and the rules and procedures of this Court, to enable the adversary proceeding to
19 proceed in a normal manner.

20 G. The Parties have agreed to continue the time to respond to the Complaint to August 15,
21 2023 and that the Status Conference be continued to September 6, 2023 at 9:00 a.m., or such later
22 date and time as the Court deems proper, to enable the Status Conference to be more meaningful
23 for all Parties.

24 **WHEREFORE**, it is hereby stipulated by the Parties, through their respective attorneys,
25 as follows:

- 26 1. Defendant’s time to respond to the Complaint shall be extended to and including
27 August 15, 2023.
- 28 2. The Status Conference for the Complaint shall be continued from August 9, 2023 at

1 9:00 a.m. to September 6, 2023 at 9:00 a.m., or such later date and time as the Court
2 deems proper.

3

4 DATED: July 23, 2023

KOGAN LAW FIRM, APC
Michael S. Kogan

5

6

7

By: /s/ Michael S. Kogan
Michael S. Kogan
Attorneys for Defendant

8

9 DATED: July 23, 2023

GOE, FORSYTHE & HODGES LLP
Reem J. Bello

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

By:


Reem J. Bello
Attorneys for Plaintiff

In re: LESLIE KLEIN Debtor(s). Joseph Vago and Erica Vago v Leslie Klein	CHAPTER: 11 CASE NUMBER: 2:23-bk-10990-SK Adv. No. 2:23-ap-01150-SK
--	---

NOTE: When using this form to indicate service of a proposed order, DO NOT list any person or entity in Category I. Proposed orders do not generate an NEF because only orders that have been entered are placed on the CM/ECF docket.

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 11500 W. Olympic Blvd., Suite 400, Los Angeles, California 90064

A true and correct copy of the foregoing document described as **ERICA VAGO and JOSEPH VAGO** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner indicated below:

I. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF") – Pursuant to controlling General Order(s) and Local Bankruptcy Rule(s) ("LBR"), the foregoing document will be served by the court via NEF and hyperlink to the document. On **July 24, 2023**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email address(es) indicated below:

Service information continued on attached page

II. SERVED BY U.S. MAIL OR OVERNIGHT MAIL(indicate method for each person or entity served): On **July 24, 2023**, I served the following person(s) and/or entity(ies) at the last known address(es) in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States Mail, first class, postage prepaid, and/or with an overnight mail service addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

III. SERVED BY PERSONAL DELIVERY, FACSIMILE TRANSMISSION OR EMAIL (indicate method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on _____ I served the following person(s) and/or entity(ies) by personal delivery, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

July 24, 2023
Date

Pamela Lynn
Type Name

/s/Pamela Lynn
Signature

In re: LESLIE KLEIN Debtor(s): Joseph Vago and Erica Vago v Leslie Klein	CHAPTER: 11 CASE NUMBER: 2:23-bk-10990-SK Adv. No. 2:23-ap-01150-SK
--	---

ADDITIONAL SERVICE INFORMATION (if needed):

I. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF")

Reem Bello (PL) rbello@goeforlaw.com
Robert Goe (PL) kmurphy@goeforlaw.com
Brian A Procel bprocel@millerbarondess.com
Eric J Olson eric@EJOLsonLaw.com
Michael I. Gottfried (IP) mgottfried@elkinskalt.com, cavila@elkinskalt.com,
lwageman@elkinskalt.com, docketing@elkinskalt.com
Nikko Salvatore Stevens (IP) nikko@cym.law, mandi@cym.law
United States Trustee (LA) ustpregion16.la.ecf@usdoj.gov
Clarisse Young (IP) youngshumaker@smcounsel.com, levern@smcounsel.com

II. SERVED BY U.S. MAIL OR OVERNIGHT MAIL - VIA U.S. MAIL

Hon. Sandra Klein
U.S. Bankruptcy Court
255 E. Temple St. #1582
Los Angeles, CA 90012